

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

ANNUNCIATION HOUSE; ANGRY TIAS
& ABUELAS OF THE RIO GRANDE
VALLEY; JENNIFER HARBURY; and
FIEL HOUSTON,

Consolidated Plaintiffs,

v.

THE STATE OF TEXAS and GREG
ABBOTT, in his official capacity as
Governor of the State of Texas,

Defendants,

STEVEN MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety,

Consolidated Defendant.

3:21-cv-00173-KC (Consolidated)

**PLAINTIFF UNITED STATES OF AMERICA'S CONSENT MOTION
FOR EXTENSION OF TIME TO RESPOND TO COURT ORDER**

On March 5, 2025, this Court issued an order noting the change in Administration and requiring the United States to file a brief by March 26, 2025, "addressing any changes to the positions set forth in its Motion for Summary Judgment, including whether it intends to continue pursuing its claims in this matter." ECF No. 143. The United States subsequently obtained an extension of the deadline to April 9, 2025, because the United

States needed more time to consider the best approach to this litigation. *See* Minute Order (March 25, 2025).

The United States is now actively engaged in discussions with counsel for the State of Texas and Governor Greg Abbott in an attempt to resolve the parties' dispute without further litigation. They need more time to allow the discussions to conclude. Accordingly, the United States respectfully request an additional three-week extension from April 9, 2025, to April 30, 2025, to respond to the Court's Order.

Undersigned counsel have conferred with counsel for the State of Texas and Governor Greg Abbott, and they indicate that they consent to the relief requested in this motion.

DATED: April 8, 2025

Respectfully submitted,

Yaakov Roth
Acting Assistant Attorney General

Alexander Haas
Director, Federal Programs Branch

/s/ Jean Lin
JEAN LIN
Special Litigation Counsel
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW Washington, DC 20005
Tel: (202) 514-3716
Fax: (202) 616-8470
E-mail: jean.lin@usdoj.gov

Attorneys for Plaintiff United States